

Comments on Final Draft 2008 AOP Received via Email from CRMWG¹ Members

From: Kenneth Baughman
Organization: Wellton-Mohawk Irrigation and Drainage District

Very minor technical comment on page 22, line 7:

At Parker Dam, the stainless steel turbine was replaced and re-wound on Unit 3 in calendar year 2006.

Should probably read:

At Parker Dam, the stainless steel turbine was replaced and **the generator was** re-wound on Unit 3 in calendar year 2006.

From: Don Gross
Organization: Arizona Department of Water Resources

I have one comment which is listed below.

Page 20, third paragraph, line 3: shouldn't this be "...year 2008 is projected to be 9.375 maf (11.654 mcm)." instead of ...year 2007 ?

From: Alton Goff
Organization: United States Section of the International Boundary and Water Commission – Yuma Office

Doug: No additional comments from Yuma Office, USIBWC.

From: Larry Dozier
Organization: Central Arizona Water Conservation District

Comments on Draft 2008 AOP

As discussed in the conference call, I do have some specific substantive comments on the Final Draft 2008 AOP. My comments are directed toward the issues. I have not attempted to provide replacement language, but will trust to Reclamation's judgment to make appropriate changes to the final AOP in consideration of all comments received.

Bottom of Page 2 and top of Page 3

¹ Colorado River Management Work Group

I think the discussion should note that there is not anticipated to be any unused apportionment except that made available through interstate storage and release agreements. Should any unused apportionment become available during the year, the Secretary will consult with the states before deciding to keep the water in system storage or distribute the water pursuant to Article II(B)(6). In making his decision, the Secretary will consider the proposed use of the water (domestic, agriculture, storage, etc.) the hydrologic conditions, and the volume of water in system storage.

Page 29 and 30: Upper Basin Reservoirs and Page 1: Purpose

The references to 602(a) determination should be removed from this AOP. I believe that we adopted the equalization tables and criteria in the Interim Guidelines and declared them to be “consistent with Section 602(a).” The annual operating plan should now be based on the Interim Guidelines, not a separate 602(a) determination. The 602(b) discussion is already adequately addressed on Page 1 – Authority. Strengthen that section if necessary and eliminate or shorten the discussion on Page 29.

Page 31: Second paragraph

This discussion of Article II(B)(6) should be consistent with my comments on the same subject referenced on Pages 2 and 3.

From: Tom Carr
Organization: Arizona Department of Water Resources

Greeting All:

The following comments come from the Arizona Department of Water Resources:

Regarding the statements concerning apportioned, but unused, water on page 2, paragraph 6 and page 31:

For 2008, there is no amount of apportioned, but projected to be unused, water available for redistribution pursuant to the previous ISG Guidelines or the new guidelines, Section 1, B. The water orders for 2008 showed full use of water for the Lower Basin. The proposed AOP language correctly reflects that no water will be reapportioned pursuant to Section 1, B of the new guidelines.

Water that may become available later in 2008 as unused apportionment should be redistributed only after a particular water contractor its state have agreed in writing to reduce a water order as required by Part 417 of the federal rules. Conversely, unused water should only be reapportioned after a water order is approved by Reclamation pursuant to its rules. Any unused water reapportioned during the year and after the first water orders have been approved is not subject to the priorities of Section 1, B of the guidelines. Section 1, B only applies at the beginning of the year. ICUA is redirected pursuant to the SIRA and not the Interim Guidelines.

The Secretary has the discretion to reapportion water that is unused. Given that Lake Mead is projected to decline in 2008, the Secretary should consider leaving unused water, if there is any, in storage.

From: Jerry Zimmerman
Organization: Colorado River Board of California

The final draft of the 2008 AOP addresses apportioned, but unused water by stating that at this time there is no unused apportionment anticipated. It further states that if during the year, apportioned, but unused, water becomes available, it will be made available in accordance with Article II(B)(6) of the Consolidated Decree.

The Arizona Department of Water Resources' comments regarding Part 417, ICUA, and SIRA agreements are addressed in other sections of the AOP and tend to confuse the issue being addressed in this section, which is apportioned, but unused, water that may be available either at the beginning of the year or become available during the year. In that context, there may be apportioned, but unused, water that may become available in 2008 because of unforeseen circumstances such as weather conditions, facility maintenance, crop prices, and/or numerous other factors. If such water were to become available and one or more contractors were to request it, the Colorado River Board of California would fully expect it to be made available by the Secretary in accordance with Article II(B)(6) of the Consolidated Decree. The proviso is that it must be allocated in accordance with the priorities within the state and it must be within a contractor's entitlement.

Currently, Lake Mead is at 50% of capacity; the Secretary is not proposing to declare a shortage condition; and 2009 is not projected to be a shortage condition. If the Secretary were proposing to declare a shortage condition in accordance with the Interim Guidelines or Lake Mead's elevation was very near the elevation at which a shortage would be declared, the Colorado River Board of California would agree that consideration should be given to not allocating water apportioned to, but projected to be unused in a state. Such a determination would only then be made after consultation with the representatives of the Governors of the Basin states for Colorado River operations.

The Colorado River Board of California does not believe that any changes need to be made to the sections of the final draft of the 2008 AOP referenced by the Arizona Department of Water Resources.

From: Randy Seaholm
Organization: Colorado Water Conservation Board

Colorado respectfully requests that Reclamation consider the following modifications to the draft 2008 AOP, which we provided verbally on the January 30, 2008 conference call.

- Page 1 - "Authority" – 2nd paragraph - New last sentence: "The 2008 AOP is reflective of operations at Glen Canyon Dam under the 'Interim Guidelines' and adjustments to Glen Canyon Dam operations pursuant to the Grand Canyon Protection that are within the parameters of the Interim Guidelines."

- Page 2 - Summary - Upper Basin Delivery - at end of the 2nd sentence insert the following: "... unless provisions in Section 6.B.3 occur *or unless the AOP is modified pursuant to the mid-year process outlined in Section 7.C. of the Interim Guidelines.*"
- Page 14 – 1st partial paragraph - last sentence: Change "in the 2008-2009 time frame" to "A draft EIS is scheduled to be released *at the end of December 2008.*"
- Page 16 - Lake Powell – 5th paragraph - end of 2nd sentence: Add, "... unless provisions in Section 6.B.3 occur *or unless the AOP is modified pursuant to the mid-year process outlined in Section 7.C. of the Interim Guidelines.*"
- Page 17 – 5th paragraph - last sentence: Modify to read, "*The annual volume of water released from Lake Powell for water year 2008 would not change as a result of the high flow test.*"
- Page 29 - 2008 Determinations - Upper Basin Reservoirs - end of 1st sentence: Add, "*unless the AOP is modified pursuant to the mid-year process outlined in Section 7.C. of the Interim Guidelines.*"
- Page 29 - 2008 Determinations - Upper Basin Reservoirs: Colorado objects to the suggested changes offered by Mr. Dozier and CAP during the conference call. We believe those suggestions, as articulated during the conference call, are inconsistent with the spirit and intent of the 7-State Agreement. We believe this Section, as currently written, is acceptable and that changes are not necessary. Reclamation needs to resist allowing the AOP to become a forum for the discussion of issues that the 7-States sought to set aside during the development of the Interim Guidelines. Should Reclamation elect to modify this Section of the AOP we would respectfully request the opportunity to further discuss such changes with Reclamation.

We appreciate and thank you for the opportunity to comment on the draft 2008 AOP.

From: Jan Matusak
 Organization: The Metropolitan Water District of Southern California

The attached file contains Metropolitan's comments on the January 25, 2008 "Final Draft Annual Operating Plan for Colorado River Reservoirs 2008" for the Bureau of Reclamation's consideration.

Metropolitan Water District of Southern California Comments on January 25, 2008,
Final Draft Annual Operating Plan for Colorado River Reservoirs, 2008

The Metropolitan Water District of Southern California offers the following comments on the January 25, 2008, "Final Draft Annual Operating Plan for Colorado River Reservoirs, 2008" for the Bureau of Reclamation's (Reclamation) consideration:

Page iii, Table 3 row, revise “2007” to “2008”.

Page iii, Table 4 row, revise “2007” to “2008”.

Page 2, Last Paragraph, Line 1, revise the sentence to read as follows: “If any unused apportionments ~~are~~ available, the Secretary shall allocate any available unused apportionments for calendar year 2008 in accordance with Article II(B)(6) of the Consolidated Decree and Section 1.B of the Interim Guidelines.” It is unknown to Metropolitan whether any unused apportionments are available for calendar year 2008 based on approved use as Reclamation has not posted “Forecasted Water Use – 2008” at <http://www.usbr.gov/lc/riverops.html>.

Page 2, Last Paragraph, Line 3, insert the following sentences after “anticipated.”, “If Reclamation subsequently projects unused apportionment to be available on its 2008 Forecasted Water Use website, Reclamation can allocate such unused apportionment absent an entity’s timely reduction in its water order. Use of such allocated water is at the user’s risk and Reclamation may rescind its approval to divert unused apportionment. Use of such allocated water may result in an inadvertent overrun by the user. The user would be required to pay back any overrun in accordance with the Inadvertent Overrun and Payback Policy.”

Page 3, Line 5, revise the sentences to read as follows: “In calendar year 2007, approximately 0.017 maf (20.72 mcm) of ICUA water stored in Arizona was ~~projected to be~~ recovered for use in California,² by the Metropolitan Water District of Southern California (MWD). In calendar year 2008, 0.025 maf (30.84 mcm) of ICUA water stored in Arizona is projected to be recovered for use in California by MWD.”

Page 3, Paragraph 4, Line 2, revise the sentence to read as follows: “In calendar years 2007 and 2008, paybacks for Arizona result ~~only~~ from IOPP overruns.”

Page 3, Paragraph 6, Line 5, revise the sentence to read as follows: “The creation and delivery of ICS during the term of the Interim Guidelines is conditioned upon several implementing agreements that were executed ~~following~~ concurrent with the Interim Guidelines ROD.”

Page 3, Paragraph 7, Line 1, revise the sentences to read as follows: “In 200~~6~~⁷ Reclamation implemented a demonstration program in the Lower Basin to create Intentionally Created Surplus Water (ICS Demonstration Program). The ICS Demonstration Program allowed entitlement holders to undertake extraordinary conservation activities in 2006 and 2007 to reduce their approved annual consumptive use of Colorado River water and account for that conserved water in Lake Mead.”

Page 4, First Full Paragraph, Line 1, revise the sentences to read as follows: “In 200~~6~~⁷ Reclamation implemented the System Conservation of Colorado River Water Demonstration Program (SC Demonstration Program) in the Lower Basin which allows entitlement holders to participate in voluntary conservation to conserve a portion of their approved annual consumptive use of Colorado River water in exchange for appropriate compensation provided by Reclamation. The water conserved (SC Water) in 2006 and 2007 ~~was~~ retained in Lake Mead to assist in providing an interim, supplemental source of water to replace the drainage

water from the Wellton-Mohawk Irrigation and Drainage District that is bypassed to the Cienega de Santa Clara and the reject stream from operation of the Yuma Desalting Plant.”

Page 7, Tables 1 and 2, the Lake Mead Live Storage value should be footnoted. The footnote should read “Based on bottom of 1.5 maf (1850 mcm) exclusive flood control space.”

Page 7, Table 1, the Change in Elevation value for Lake Mohave should be lowered so that it appears in the same row as the other values for Lake Mohave.

Page 9, Table 3, the Probable Maximum and the Most Probable columns could be aligned by the decimal points to make the columns easier to read.

Page 9, Table 4, the Probable Maximum, Most Probable, and Probable Minimum columns could be aligned by the commas to make the columns easier to read.

Page 12, First Full Paragraph, Line 6, revise the sentence to read as follows: “Flows in the Green River at Jensen remained above 8,300 cfs (235 cms) until May 26, 2007 (12 days).”

Page 12, Fifth Full Paragraph, Line 4, revise the sentence to read as follows: “In January, releases began to be decreased in response to decreasing forecasted inflow and reached 800 cfs in March 2007.”

Page 14, Third Full Paragraph, Line 1, revise the sentence to read as follows: “Water year 2007 unregulated inflow was 1.097 maf (1353 mcm), or 98 percent of average.”

Page 19, Table 7, the font for the numeric values in the center and right columns could be revised to match the font for the text in the left column.

Page 21, Fourth Full Paragraph, Line 6, the sentence, “Diversions from Lake Havasu during calendar year 2007 by CAP and MWD are projected to be 1.569 maf (1,935 mcm) and 0.697 maf (860 mcm), respectively.” could be revised to indicate what the actual diversions were in calendar year 2007. For Metropolitan, diversions were 0.716 maf (883 mcm).

Page 21, Fifth Full Paragraph, Line 2, revise the sentence to read as follows: “Diversions from Lake Havasu in calendar year 2008 by CAP and MWD are expected to be 1.575 maf (1,942 mcm) and 0.78419 maf (~~967887~~ mcm), respectively.” based on Reclamation’s January 3, 2007 (sic) letter to Metropolitan.

Page 24, Line 4, revise the sentence to read as follows: “These diversions supply all the irrigation districts in the Yuma area, in Wellton-Mohawk, in the Imperial and Coachella Valleys, and through Siphon Drop and Pilot Knob to the Northerly International Boundary (NIB) for diversion at Morelos Dam to the Mexicali Valley in Mexico.”

Page 24, Line 8, the sentence “Flows arriving at Imperial Dam for calendar year 2007 were expected to be 6.812 maf (8,402 mcm).” could be revised to indicate what the actual flows arriving at Imperial Dam were in calendar year 2007.

Page 24, Last Line, revise the sentence to read as follows: “Two agreements¹⁹ were executed ~~following concurrent with~~ the Interim Guidelines ROD that fund the construction of the Drop 2 Storage Reservoir and the integral confluence structure and provide for the funding parties to receive quantities of System Efficiency ICS in consideration for their financial contributions.”

Page 25, Line 1, the sentence “In calendar year 2007 the amount of water discharged through the Main Outlet Drain (bypass flows) was anticipated to be 0.110 maf (135.8 mcm) at an approximate concentration of total dissolved solids of 2,430 parts per million (ppm).” could be revised to indicate what the actual amount of water discharged through the Main Outlet Drain was in calendar year 2007.”

Page 25, Second to the Last Line, revise the sentence to read as follows: “The creation and delivery of ICS during the term of the Interim Guidelines is conditioned upon several implementing agreements²⁰ that were executed ~~following concurrent with~~ the Interim Guidelines ROD.”

Page 26, Line 7, insert the following sentence after “project.”, “MWD is also contemplating either creation or delivery of Extraordinary Conservation ICS depending upon water supply and demand conditions in MWD’s service area.”

Page 26, First Full Paragraph, Line 1, revise the sentences to read as follows: “In 200~~6~~⁷ Reclamation implemented a demonstration program in the Lower Basin to create Intentionally Created Surplus Water (ICS Demonstration Program). The ICS Demonstration Program allowed entitlement holders to undertake extraordinary conservation activities in 2006 and 2007 to reduce their approved annual consumptive use of Colorado River water and account for that conserved water in Lake Mead.”

Page 26, Footnote 21, revise the sentence to read as follows: “No ICS Water was created is projected to be conserved in calendar year 2007 by MWD and IID.”

Page 26, Second Full Paragraph, Line 2, delete the sentence “Although MWD may, either separately or in conjunction with other California agencies with rights to use Colorado River water, create up to 0.200 maf (246.9 mcm) in calendar year 2007, MWD does not anticipate the creation of ICS water in calendar year 2007.” as no ICS water was created in 2007 by MWD.

Page 26, Second Full Paragraph, Line 5, revise the sentence to read as follows: “In 2008, should MWD ~~may~~ take delivery ~~of up to 0.22 maf (27.14 mcm)~~ of Intentionally Created Surplus Water created under the ICS Demonstration Program, the amount delivered would total up to 0.046 maf (56.96 mcm).”

Page 26, Third Full Paragraph, Line 1, revise the sentences to read as follows: “Reclamation also entered into an agreement with IID for the creation of Intentionally Created Surplus Water in 200~~6~~⁷.²³ ~~Although IID may undertake extraordinary conservation measures to create up to 0.025 maf (30.86 mcm) in calendar year 2007, IID does not anticipate the creation of Intentionally Created Surplus Water in calendar year 2007.~~”

Page 26, Fourth Full Paragraph, Line 1, revise the sentence to read as follows: “In 200~~6~~⁷ Reclamation implemented the System Conservation of Colorado River Water Demonstration Program (SC Demonstration Program)....”

Page 27, Second Full Paragraph, Line 1, the sentences: “Total delivery to Mexico for calendar year 2007 was projected to be approximately 1.517 maf (1,871 mcm), with excess flow of approximately 0.017 maf (20.97 mcm). Of the total delivery, approximately 0.140 maf (172.8 mcm) is projected to be delivered at the Southerly International Boundary (SIB) and 1.377 maf (1,699 mcm) was projected to be delivered at the NIB.” could be revised to indicate the actual total delivery to Mexico, the total actual excess flow, and the actual amount delivered at the SIB and the NIB.

Page 27, Second Full Paragraph, Line 7, delete the sentence: “As part of Mexico’s delivery schedule, it is anticipated that 602 acre-feet (0.743 mcm) will be diverted from Lake Havasu and delivered through MWD, San Diego County Water Authority, and the Otay Water District’s respective distribution system facilities to Tijuana, Baja California at the request of the Mexican section of the IBWC in calendar year 2007.” as no water was diverted from Lake Havasu for Tijuana in 2007.

Page 27, Third Full Paragraph, Line 2, revise the sentence to read as follows: “In accordance with Minute No. 310 and the Emergency Delivery Agreement²⁶ up to 0.001 maf per month (1.481 mcm) may be delivered for Tijuana through MWD, San Diego County Water Authority, and the Otay Water District’s respective distribution system facilities in California.”

Page 27, Fifth Full Paragraph, Line 1, the sentence: “Drainage flows to the Colorado River from the Yuma Mesa Conduit and South Gila Conduit were projected to be 0.045 maf (55.5 mcm) and 0.065 maf (80.2 mcm), respectively, for calendar year 2007.” could be revised to indicate what the drainage flows actually were.

Page 28, Line 1, the sentence: “The salinity differential for calendar year 2007 is projected to be 143 ppm by the United States’ count.” could be revised to indicate what the salinity differential actually was.

Page 28, First Full Paragraph, Line 8, the sentence: “No water is projected to be bypassed in 2007, however, up to 0.008 maf (9.875 mcm) could be spilled to the diversion channel for salinity control in 2008.” could be revised to indicate whether any water was bypassed in 2007, and if any water were bypassed, the amount bypassed.

Page 31, First Full Paragraph, Line 4, revise the sentence to read as follows: “If any unused apportionments are~~is~~ available, the Secretary shall allocate any available unused apportionments~~s~~ for calendar year 2008 in accordance with Article II(B)(6) of the Consolidated Decree and Section 1.B of the Interim Guidelines.” Following this sentence, insert the following sentences: “If Reclamation subsequently projects unused apportionment to be available on its 2008 Forecasted Water Use website, Reclamation can allocate such unused apportionment absent an entity’s timely reduction in its water order. Use of such allocated water is at the user’s risk and

Reclamation may rescind its approval to divert unused apportionment. Use of such allocated water may result in an inadvertent overrun by the user. The user would be required to pay back any overrun in accordance with the Inadvertent Overrun and Payback Policy.”

Page 31, Second Full Paragraph, Line 5, revise the sentences to read as follows: “In calendar year 2007, approximately 0.017 maf (20.72 mcm) of ICUA water stored in Arizona was ~~projected to be~~ recovered for use in California by MWD. In calendar year 2008, 0.025 maf (30.84 mcm) of ICUA water stored in Arizona is projected to be recovered for use in California by MWD. SNWA contemplates notifying the Secretary of the Interior that it proposes to make from 0.015 to 0.025 maf (18.5 to 30.8 mcm) of unused Nevada normal apportionment available for storage by MWD in accordance with the parties’ Interstate Storage and Release Agreement with the United States and the Colorado River Commission of Nevada.”

Page 31, Fifth Full Paragraph, Line 2, revise the sentence to read as follows: “In calendar years 2007 and 2008, paybacks for Arizona result ~~only~~ from IOPP overruns.”

Page 31, Sixth Full Paragraph, Line 3, revise the text to read: “(4.40 mcm). Given....”

The graphs of Attachment I were missing from the pdf file provided by the Bureau of Reclamation.

From: John Shields
Organization: State of Wyoming

Doug Blatchford, Tom Ryan and fellow members of the Colorado River Management Work Group,

The State of Wyoming, through my participation in the conference call on January 31st, appreciates the opportunity to provide the following additional comments, in writing, with regard to final modification (prior to the signing and issuance) of the 2008 Annual Operating Plan for the Colorado River Reservoir System:

We concur with and support the suggestions offered by the State of Colorado's representative earlier this evening concerning pages 2 through 29 (see the e-mail submitted by Randy Seaholm on behalf of the State of Colorado below).

With further regard to Page 29 "2008 Determinations - Upper Basin Reservoirs," Wyoming strongly supports the language as written and presented for consideration prior to the conference call. The proposed basis for making significant deletions as proposed by several representatives of the Central Arizona Water Conservation District (CAP) during the conference call are not persuasive. In particular, the language concerning Section 602(a) and (b) remains entirely germane to the determinations made in the AOP document by the Secretary of the Interior. The State of Wyoming concurs in the comments made during the conference call by the State of Colorado's representative, Utah's representative and the Upper Colorado River Commission's Executive Director. We would urge Reclamation to not be swayed to make language changes to

the AOP based on individual party's characterizations of the provisions of the 7-States Agreement and the Interim Shortage Guidelines. Further, Wyoming would want to be advised and to further discuss such changes if Reclamation would choose to make any modifications to this pection of the AOP.

From: Norm Henderson
Organization: National Park Service

The NPS submits the following comments to the draft AOP (1/25/2008 version) in addition to those submitted to BOR on 9/6 as requested:

Page 17, first paragraph, last sentence; remove the final clause "while minimizing impacts to hydropower capability and flexibility." This clause is inconsistent with the purpose specified for the LTEP process in the FR (December 12, 2006).

Page 17, third paragraph; to be consistent with the first paragraph and in other parts of the AOP, I suggest that a purpose for the proposed action be specified (including the HFE, sept/oct steady flows, and potential conservation measures). A purpose is specified for the HFE alone but not the entire action.

Page 17, fifth paragraph, next to last sentence; I suggest inserting a sentence to clarify that if the DOI Secretary decides to move forward with the most recent proposed action and reconsultation (March HFE and Sept/Oct steady flows) that monthly release volumes will be adjusted as specified in Table 6.

From: Leslie James
Organization: Colorado River Energy Distributors Association

CREDA cannot support these proposed changes. The first was discussed at length back in the June (I believe) consultation; the AOP language IS consistent with the scoping report from the the LTEP process of March of 2006.

The second and third comments are inappropriate for this AOP and are premature.
Thank you for your consideration of these comments.

From: Norm Henderson
Organization: National Park Service

Doug -

Attached is the latest from BOR about the Aspinall EIS process. It has the specific timeframes for the deliverables (DEIS and FEIS/ROD). It would seem that your general statement in the AOP covers all these dates but Randy Seaholm seems to want to get down to specifics.

From: Robert Lynch
Organization: Irrigation and Electrical Districts' Association of Arizona

Two late comments:

1. Randy Seaholm's first suggestion effectively kills the federal defense in the GCT LAWSUIT; I know he means well, but he needs to leave the legal issues to the lawyers;
2. Norm Henderson's suggestions likewise disadvantage the Secretary in the lawsuit and should not be adopted; please consult with your attorneys.

From: Burt Hawkes
Organization: Western Area Power Administration

Western agrees with the CREDA and cannot support the proposed changes by NPS

From: Randy Seaholm
Organization: Colorado Water Conservation Board

We would concur with CREDA's comments.

From: Wade Noble
Organization: Wellton-Mohawk Irrigation and Drainage District

The Yuma Arizona irrigation districts and other water entities concur with CREDA and do not support or accept the proposed changes.

From: Bill Rinne
Organization: Southern Nevada Water Authority

Hi Steve, Per our discussion and your request, I am providing a sentence for your consideration for addition to the 2008 AOP that would identify Nevada's intent to direct a portion of its basic apportionment for storage by MWD in 2008. In looking at the draft AOP it appears to me that this sentence would be added to the appropriate paragraphs in the **summary** (my page 3) and again in the body of the AOP under **2008 Determinations – Lower Basin Reservoirs** (my page 31). Please let me know if we need to discuss more.

"The SNWA proposes to make from 0.015 to 0.025 maf (18.5-30.8 mcm) of unused Nevada basic apportionment available for storage by MWD in 2008."

From: Norm Henderson
Organization: National Park Service

Doug -

The EA for the experimental action proposed by BOR for the next 5 years is expected to be out tomorrow. In that EA the specific purpose of the action is specified. I suggest that this purpose be included on page 17 of the 2008 AOP.

END OF FILE